

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

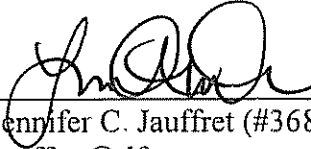
VERNETTE WALKER,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 06-138-MPT
)	
THE NEWS JOURNAL and)	
ANN HINES,)	
)	
Defendants.)	

NOTICE OF SUBPOENAS

To: Vernetta Walker
29 Richard Road
New Castle, Delaware 19720
Pro Se Plaintiff

PLEASE TAKE NOTICE that on August 28, 2007, the attached subpoenas were issued to be served on the following in accordance with Rule 45 of the Federal Rules of Civil Procedure:

Vincent Ramunno, Esquire
Gary Linarducci, Esquire



Jennifer C. Jauffret (#3689)
Jauffret@rlf.com
Lori A. Brewington (#4522)
Brewington@rlf.com
Richards, Layton & Finger
One Rodney Square
P. O. Box 551
Wilmington, Delaware 19899
(302) 651-7700
Attorneys for Defendant

Dated: August 29, 2007

AO88 (Rev. 1/07) Subpoena in a Civil Case

Issued by the
UNITED STATES DISTRICT COURT
 DISTRICT OF DELAWARE

VERNETTE WALKER,

SUBPOENA IN A CIVIL CASE

v.

Case Number:¹ 06-138-MPT

THE NEWS JOURNAL and ANN HINES

TO: Vincent Ramunno, Esquire
 Ramunno, Ramunno & Scerba, P.A.
 903 N. French Street
 Wilmington, DE 19801

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
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- ☐ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

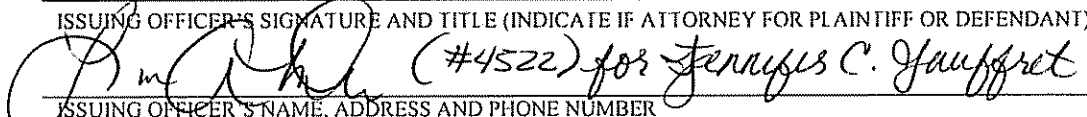
Any and all records and related documents, including, but not limited to, correspondence, billing information, financial statements, settlement agreements, monetary awards, concerning Vernetta Walker and her car accident involving State Farm Insurance.

PLACE Richards, Layton & Finger 920 N. King Street, P.O. Box 551, Wilmington, DE 19899	DATE AND TIME September 7, 2007 by 5:00 p.m.
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- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)  (#4522) for Jennifer C. Jauffret	DATE August 28, 2007
ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER Jennifer C. Jauffret (#3689) (Jauffret@rlf.com), Richards, Layton & Finger, P.O. Box 551, Wilm., DE 19899 302-651-7568	

(See Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d) and (e) on next page)

¹ If action is pending in district other than district of issuance, state district under case number

PROOF OF SERVICE

DATE

PLACE

SERVED

8/28/07

903 N. FRENCH ST. WILMINGTON, DE

SERVED ON (PRINT NAME)

MANNER OF SERVICE

VINCENT RAMUNNO, ESQ.

ACCEPTED BY JENNIFER HAUS

SERVED BY (PRINT NAME)

TITLE

BARRY EVELAND

PROCESS SERVER

DECLARATION OF SERVER

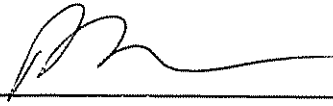
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

8/28/07

DATE

SIGNATURE OF SERVER


BRANDYWINE PROCESS SERVERS, LTD.
P.O. BOX 1360
WILMINGTON, DE 19899-1360
302-475-2600

Rule 45, Federal Rules of Civil Procedure, Parts C & D-
(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials; or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(h) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that,

subject to the provisions of clause (c)(3)(B) (iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim

AO88 (Rev. 1/07) Subpoena in a Civil Case

Issued by the
UNITED STATES DISTRICT COURT
 DISTRICT OF DELAWARE

VERNETTE WALKER,

SUBPOENA IN A CIVIL CASE

v.

Case Number:¹ 06-138-MPT

THE NEWS JOURNAL and ANN HINES

TO: Gary Linarducci, Esquire
 Lunarducci & Butler
 910 W. Basin Rd., Suite 100
 Creekwood Office Complex
 New Castle, DE 19720

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PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☐ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

Any and all records and related documents concerning Vernet Walker and her request and/or receipt of Social Security benefits, including, but not limited to, any application(s), form(s), correspondence, determinations and/or findings by the Social Security Administration.

PLACE

Richards, Layton & Finger
 920 N. King Street, P.O. Box 551, Wilmington, DE 19899

DATE AND TIME

September 7, 2007 by 5:00 p.m

- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6)

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

August 28, 2007

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Jennifer C. Jauffret (#3689) (Jauffret@rlf.com), Richards, Layton & Finger, P.O. Box 551, Wilm., DE 19899
 302-651-7568

(See Rule 45, Federal Rules of Civil Procedure: Subdivisions (c), (d) and (e), on next page)

¹ If action is pending in district other than district of issuance, state district under case number

PROOF OF SERVICE

DATE

PLACE

SERVED

8/28/07

910 W. BASIN RD. NEW CASTLE, DE

SERVED ON (PRINT NAME)

MANNER OF SERVICE

GARY LINARDUCCI, ESQ.

ACCEPTED BY SHAMEE HAYMAN

SERVED BY (PRINT NAME)

TITLE

KEVIN DUNN

PROCESS SERVER

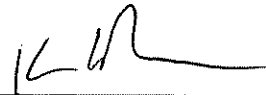
DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

8/28/07

DATE


 SIGNATURE OF SERVER
BRANDYWINE PROCESS SERVERS, LTD.**P.O. BOX 1360****WILMINGTON, DE 19899-1360****302-475-2600****Rule 45, Federal Rules of Civil Procedure, Parts C & D-****(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials; or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

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(h) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that,

subject to the provisions of clause (c)(3)(B) (iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

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(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

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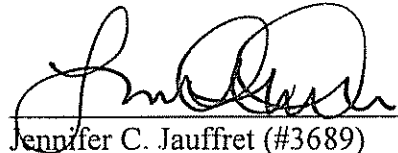
(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection against preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2007, I electronically filed the foregoing Notice of Subpoenas with the Clerk of Court using CM/ECF which will send notification of such filing to the following and on August 29, 2007, mailed, via first class mail, postage prepaid, copies of the same to:

Vernette Walker
29 Richard Road
New Castle, Delaware 19720
Pro Se Plaintiff

A handwritten signature in black ink, appearing to read "Jennifer C. Jauffret", is written over a horizontal line.

Jennifer C. Jauffret (#3689)
Jauffret@rlf.com
Lori A. Brewington (#4522)
Brewington@rlf.com
Richards, Layton & Finger
One Rodney Square
P. O. Box 551
Wilmington, Delaware 19899
(302) 651-7700
Attorneys for Defendant